

UNITED STATES DISTRICT COURT

Middle District of Pa. x

Juan Perez Cuevas
Petitioner,FILED
SCRANTON

JUN 06 2001

PETITION

PER LMH
DEPUTY CLERK

-v-

Pike County Jail

1: CV01-1008

Respondent.

3. Name and location of court which entered judgment of conviction under which you are presently confined (if applicable).
Immigration Court, Ulster Correctional Facility, 800 Berne Rd., Nanassah, NY, 12458
4. Date of judgment of conviction May 15, 1998
5. Length of sentence Removed Sentencing Judge Joe D. Miller
6. Nature of offenses for which you were convicted: Violation to the INS laws Sections 237(a)(2)(3)(i) and 237(a)(1)(A)(iii) of the Immigration and Nationality Act, as amended by IIRIRA of 1996.
7. Were you sentenced on more than one count of an indictment, or on more than one indictment, in the same court and at the same time: Yes ☒ No ☐
8. Do you have any future sentence to serve after you complete the sentence imposed by the judgment under attack? Yes ☐ No ☒
- A. If so, give name and location of court which imposed sentence to be served in the future:

- B. And give date and length of sentence to be served in future:

- C. Have you filed, or do you contemplate filing, any petition attacking the judgment which imposed the sentence to be served in the future? Yes ☒ No ☐
- D. State concisely every ground on which you claim that you are being held unlawfully. Summarize briefly the facts supporting each ground.
- A. Ground one: Through my detention in this jail it has failed to comply with the INS detention standards. Due to my grievances to this end, a hostile position is

abused by some staff. It came to a point that I am being secretly
even though the charges that brought the action were dismissed.

B. Ground two: Deprivation of My Civil Right

Supporting FACTS (tell your story briefly without citing cases or law):

Since early October 2000, I have been requesting copies of my medical
record, a letter describing my medical problems, the law library to be
up-dated, file 8 U.S.C.A. to be brought to the library, the type writer to
be fixed, and to be given access to the law library as mandated by the INS
detection standards to meet court deadline. All these grievances were
approved but none honored. As a result I lost a 5/26/01 court deadline and am
about to lose a 6/21/01 deadline also. Court intervention need a

C. Ground three: Physical and Psychological Damages.

Supporting FACTS (tell your story briefly without citing cases or law):

Due to the unending Psychological and verbal abuses. On 5/22/01, after
been take away in shackles and been falsely accused of breaking the rule
I broke down in tears for around 20 or more minutes couldn't breath
properly and almost fainted. I not even could talk. the Psychiatric was call
He said the amount of stress caused the crisis. My wrongful segregate
in K11 with a milk and bad diet is worsening my already bad kidneys.

(Please insert additional grounds, if necessary)

Wherefore, petitioner prays that the Court grant petitioner relief to which he/she may be entitled in this proceeding.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 5/31/01
 Date

CC:

Pike County Jail
Delivered by hand

Juan Perez Cuevas
 Name (Print)
OCA# 99-09025/A34-204-095
 Inmate Identification Number

[Signature]
 Signature
Pike County Jail

Address
HC8-Box 8601

Hawley, Pa. 18428

Telephone Number

February 17, 1955
 Date of Birth